

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO: WAVE 4 CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**MOTION TO LIMIT THE TESTIMONY
OF PROF. DR. MED. UWE KLINGE**

Defendants Ethicon, Inc., Ethicon LLC and Johnson & Johnson (“Ethicon”) move to limit the testimony of Prof. Dr. Med. Uwe Klinge. Dr. Klinge’s proposed opinion testimony is unreliable and irrelevant under the standard set forth in *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993). Ethicon incorporates its Memorandum in Support of Motion to Limit the Testimony of Prof. Dr. Med. Uwe Klinge, and also the following exhibits:

1. List of cases to which this motion applies, attached as Exhibit A.
2. Rule 26 Expert Report of Prof. Dr. Med. Uwe Klinge (Nov. 16, 2015), attached as Exhibit B.
3. Rule 26 Expert Report of Prof. Dr. Med. Uwe Klinge (Nov. 17, 2015), attached as Exhibit C.
4. Okulu, et al, “Use of three types of synthetic mesh material in sling surgery: a prospective randomized clinical trial evaluating effectiveness and complications,” *Scandinavian Journal of Urology*, (2013), attached as Exhibit D.
5. Deposition of Prof. Dr. Med. Uwe Klinge taken November 4, 2015, attached as Exhibit E.
6. Deposition of Prof. Dr. Med. Uwe Klinge taken October 5, 2015, attached as Exhibit F.

7. Deposition of Prof. Dr. Med. Uwe Klinge taken November 15, 2013, attached as Exhibit G.
8. Deposition of Prof. Dr. Med. Uwe Klinge taken November 10, 2014, attached as Exhibit H.

WHEREFORE, FOR THESE REASONS and as more fully set forth in Ethicon's supporting memorandum of law, Ethicon respectfully requests that this Court enter an order granting Ethicon's Motion to Limit the Testimony of Prof. Dr. Med. Uwe Klinge.

Respectfully submitted,

ETHICON, INC., ETHICON LLC AND
JOHNSON & JOHNSON

/s/ David B. Thomas

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CERTIFICATE OF SERVICE

I certify that on April 13, 2017, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

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